

EXHIBIT 21

1 Kenneth A. Gallo (*pro hac vice*)
 2 Joseph J. Simons (*pro hac vice*)
 3 Craig A. Benson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
 4 2001 K Street, NW
 Washington, DC 20006-1047
 Telephone: (202) 223-7300
 Facsimile: (202) 223-7420
 Email: kgallo@paulweiss.com
 Email: jsimons@paulweiss.com
 Email: cbenson@paulweiss.com

7 Stephen E. Taylor (SBN 058452)
 Jonathan A. Patchen (SBN 237346)
TAYLOR & COMPANY LAW OFFICES, LLP
 One Ferry Building, Suite 355
 San Francisco, California 94111
 Telephone: (415) 788-8200
 Facsimile: (415) 788-8208
 Email: staylor@tcolaw.com
 Email: jpatchen@tcolaw.com

12 *Attorneys for Sharp Electronics Corporation*

14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

16 **In Re CATHODE RAY TUBE (CRT)**
ANTITRUST LITIGATION

Case No. 07-cv-5944-SC
 MDL NO. 1917

18 This Document Relates to:

19 *Sharp Electronics Corporation, Sharp Electronics*
 20 *Manufacturing Company of America, Inc. v. Hitachi,*
 21 *Ltd. et al., Case No. 13-cv-1173 SC.*

PLAINTIFF SHARP
ELECTRONICS CORPORATION'S
SECOND SUPPLEMENTAL
RESPONSES AND OBJECTIONS
TO DEFENDANT SAMSUNG SDI
AMERICA, INC.'S FIRST SET OF
INTERROGATORIES

22 **PROPOUNDING PARTIES:** Samsung SDI America, Inc.

23 **RESPONDING PARTIES:** Sharp Electronics Corporation

24 **SET NO.:** ONE

Electronics Corp. v. MGA Electronics, Inc., 227 F.R.D. 313, 323 (C.D. Cal. 2004) (“plaintiff’s response that the information requested could be found in business records is inadequate under Rule 33(d) because it failed to identify where in the records the answers could be found”); *State of Colorado v. Schmidt-Tiago Construction Co.*, 108 F.R.D. 731, 735 (D. Col. 1985) (“The appropriate answer when documents are to be used [under Rule 33(d)] is to list the specific document provided the other party . . .”); *Pulsecard, Inc. v. Discover Card Servs.*, 168 F.R.D. 295, 305 (D. Kan. 1996) (“Under the guise of Fed. R. Civ. P. 33(d) [parties] may not simply refer generically to past or future production of documents. They must identify in their answers to the interrogatories specifically which documents contain the answer. *Otherwise they must completely answer the interrogatories without referring to the documents.*”) (emphasis added).

OBJECTIONS TO INSTRUCTION NO. 6:

Sharp Electronics objects to Instruction No. 6 because it is overly broad, unduly burdensome, oppressive and inconsistent with Federal Rule of Civil Procedure 33(d). Sharp Electronics states that it will comply with Rule 33(d) by specifying records in sufficient detail to enable the Defendant to locate and identify them as readily as Sharp Electronics could.

RESPONSES AND OBJECTIONS TO INTERROGATORIES

Interrogatory No. 3:

Separately for each entity that YOU contend participated in the alleged conspiracy in response to Interrogatory No. 1 (including separately for each CRT PRODUCT manufacturer), IDENTIFY all EVIDENCE upon which YOU intend to rely to prove such participation, including:¹

- a. Each DOCUMENT that YOU contend identifies that entity as a CO-CONSPIRATOR;
- b. All testimony that YOU contend identifies that entity as a CO-CONSPIRATOR;

¹ See Special Master Martin Quinn’s Order re Motion for Protective Order By Direct Purchaser Plaintiffs Re Contention Discovery Requests Served By Certain Defendants, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1819 (Dkt. No. 2114) (filed Nov. 3, 2010), at 4 (“identification of meetings where DPP’s contend that the alleged conspiracy unfolded, while a big job, is sufficiently discrete to be answered and plainly important.”).

- 1 c. Date of each meeting or competitor communication in which YOU contend the
2 entity participated;
- 3 d. Location of each alleged meeting, if applicable;
- 4 e. Names of each specific corporate entity that directly participated in each meeting
5 or competitor communication;
- 6 f. Names of the individuals that YOU allege participated in each meeting or
7 competitor communication; and
- 8 g. Whether YOU contend the EVIDENCE reflects an agreement to restrict supply or
9 limit production of CRTs.

10 **Response to Interrogatory No. 3:**

11 Sharp Electronics refers to and incorporates its General Objections as if set forth fully
12 herein. In addition, Sharp Electronics specifically objects to this Interrogatory because it is
13 overly broad, unduly burdensome, and oppressive, and seeks information that is maintained by
14 and equally available to the Defendant and/or stated in publicly available documents. Sharp
15 Electronics further objects to this Interrogatory on the grounds that it is premature, and that it
16 seeks to impose an undue burden on Sharp Electronics to state its entire case on an incomplete
17 record and review and analyze all information obtained in discovery thus far at this stage of this
18 litigation, many months before the agreed-upon fact discovery deadline. Sharp Electronics has
19 not completed its discovery and preparation in this matter, and its investigation of these cases is
20 ongoing. Further investigation and discovery may result in the identification of additional
21 information or contentions, and Sharp Electronics reserves the right to amend or supplement its
22 Response. Sharp Electronics further objects to this Interrogatory to the extent it calls for a
23 conclusion on an issue of law. Sharp Electronics further objects to this Interrogatory to the
24 extent that it calls for expert testimony and states that Sharp Electronics will serve expert reports
25 and supporting documentation according to the stipulated schedule for expert discovery in this
26 matter.

27 Subject to and without waiving the foregoing objections, pursuant to Federal Rule of
28 Civil Procedure 33(d), Sharp Electronics refers the Defendant to documents produced in this

279, 280, 281, 283, 285, 288, 290, 291, 317, 320, 323, 330, 332, 334, 353, 371, 373, 377, 401, 404, 436, 451, 461, 465, 471, 474, 478, 485, 487, 491, 492, 496, 497, 514, 515, 517, 518, and 531; the deposition testimony of Jason Lu dated February 27-28, 2013, at 74, 78, 85, 86, 90, 96, 99, 109, 113, 117, 123, 131, 137, 138, 139, 157, 158, 160, 162, 163, 179, 183, 190, 203, 206, 210, 216, 217, 222, 225, and 242; and the deposition testimony of Shen-Jen Yang dated February 22-24, 2013, at 80, 83, 87, 90, 98, 103, 106, 110, 115, 130, 134, 139, 163, 172, 190, 198, 203, 208, 223, 238, 251, and 274.

Supplemental Response to Interrogatory No. 3:

Subject to and without waiving the foregoing objections, pursuant to Federal Rule of Civil Procedure 33(d), Sharp Electronics additionally refers the Defendant to documents produced in this litigation (and including any English language translations thereof and any attachments to documents) at Bates numbers beginning at: HU00028908, CHU000660337, HDP-CRT00004468, HDP-CRT00023417, HDP-CRT00026077, HDP-CRT00026189, HDP-CRT00026227, HDP-CRT00048797, HDP-CRT00049313, DHP-CRT00025934, JLJ-00004807, LGE00067201, LGE00067202, LPD-NL00214835, MTPD-0038856, MTPD-0275189, MTPD-0410018, MTPD-0479721, MTPD-0580795, MTPDA_SEC-0896104, MTPDA_SEC-0896167, MTPDA_SEC-0896171, PHLP-CRT-005637, PHLP-CRT-005669, PHLP-CRT-010260, PHLP-CRT-010263, PHLP-CRT-012615, PHLP-CRT-014272, PHLP-CRT-014275, PHLP-CRT-024274, PHLP-CRT-024275, PHLP-CRT-084315, PHLP-CRT-089512, PHLP-CRT-089918, PHLP-CRT-090221, PHLP-CRT-091458, PHLP-CRT-091465, PHLP-CRT-091467, PHLP-CRT-091703, PHLP-CRT-094860, PHLP-CRT-098241, PTC-00006474, PTC-00009040, SDCRT-0052170, SDCRT-0063870, SDCRT-0086256, SDCRT-0090163, SDCRT-0090167, and SDCRT-0090174.

Second Supplemental Response to Interrogatory No. 3:

Subject to and without waiving the foregoing objections, Sharp Electronics refers the Defendants to the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying materials; the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and

1 Demonstrative Exhibit 1 dated July 15, 2014; the expert report of Dr. Michael Whinston dated
2 August 5, 2014; and to:

- 3 • Plaintiff Sharp Electronics Corporation and Sharp Electronics Manufacturing
4 Company of America, Inc.'s (collectively, "Sharp") Objections and Responses to
5 Defendants MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of
6 Interrogatories;
- 7 • Sharp's Responses to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
8 Electronics Corporation and Sharp Electronics Manufacturing Company of America,
9 Inc.;
- 10 • Sharp's Responses to Hitachi, Ltd.'s First Set of Interrogatories to Sharp
11 Electronics Corporation and Sharp Electronics Manufacturing Company of America,
12 Inc.;
- 13 • Sharp's Responses to Hitachi Electronic Devices (USA), Inc.'s Second Set of
14 Interrogatories to Sharp Electronics Corporation and Sharp Electronics Manufacturing
15 Company of America, Inc.;
- 16 • Sharp's Responses to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp
17 Electronics Corporation and Sharp Electronics Manufacturing Company of America,
18 Inc.;
- 19 • Sharp's Responses to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First
20 Set of Interrogatories to Sharp Electronics Corporation and Sharp Electronics
21 Manufacturing Company of America, Inc.
- 22 • Sharp's Responses to Defendant LG Electronics U.S.A., Inc.'s First Set of
23 Interrogatories to Sharp Electronics Corporation and Sharp Electronics Manufacturing
24 Company of America, Inc.
- 25 • Sharp's Responses to Panasonic Corporation of North America's First Set of
26 Interrogatories to Sharp Electronics Corporation and Sharp Electronics Manufacturing
27 Company of America, Inc.; and

- 1 • Sharp's Responses to Koninklijke Philips N.V.'s First Set of Interrogatories to
2 Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of
3 America, Inc.

4 **Interrogatory No. 12:**

5 If YOUR response to Interrogatory 11 was in the affirmative, IDENTIFY all EVIDENCE
6 upon which YOU intend to rely to prove such OWNERSHIP.

7 **Response to Interrogatory No. 12:**

8 Sharp Electronics refers to and incorporates its General Objections as if set forth fully
9 herein.

10 Subject to and without waiving the foregoing objections, Sharp Electronics states that, to
11 the extent necessary, the corporate structure of Sharp Electronics can be established by testimony
12 from a company witness and/or documentary evidence.

13 **Supplemental Response to Interrogatory No. 12:**

14 Sharp Electronics refers to and incorporates its General Objections as if set forth fully
15 herein.

16 Subject to and without waiving the foregoing Objections, Sharp Electronics additionally
17 refers Defendants to the transcripts of and the exhibits introduced during the depositions of
18 Vincent Sampietro dated June 25, 2014, Robert Scaglione date June 26, 2014, and Toshihito
19 Nakanishi dated July 29-30, 2014.

20 **Interrogatory No. 14:**

21 If YOUR response to Interrogatory 13 was in the affirmative, IDENTIFY all EVIDENCE
22 upon which YOU intend to rely to prove such CONTROL.

23 **Response to Interrogatory No. 14:**

24 Sharp Electronics refers to and incorporates its General Objections as if set forth fully
25 herein.

26 Subject to and without waiving the foregoing objections, Sharp Electronics states that, to
27 the extent necessary, the corporate structure of Sharp Electronics can be established by testimony
28 from a company witness and/or documentary evidence.